

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA**

UNITED STATES OF AMERICA,

Plaintiff,

-vs-

CHANG ZHANG,

Defendant.

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Case No. CR-24-316-R

**UNOPPOSED MOTION TO COMBINE PLEA
WITH SENTENCING HEARING**

COMES NOW, Chang Zhang, defendant in the above styled action, by and through her attorney of record, Edward M. Blau, and pursuant to LCrR 11.1 and in compliance with LCrR 12.1 (f)(1-8), submits her Unopposed Motion to Combine Plea and Sentencing Hearing. In support of said motion, Counsel for the Defendant states:

1. On August 7, 2024, the Federal Grand Jury returned an Indictment charging Ms. Zhang with one (1) count of Drug Conspiracy and one (1) count of Possession of Marijuana with Intent to Distribute; Aiding and Abetting. (Doc. 1).

2. On September 3, 2024, Ms. Zhang was arraigned on the complaint, she was released on bond, and an Order Setting Conditions of Release was entered (Docs. 5-8).

3. Ms. Zhang has demonstrated for the last eight (8) months that she is not a flight risk, that she has significant ties to her community, and she is not a danger to the community.

4. Ms. Zhang is a highly respected oil and gas engineer based in Houston, Texas. Her expertise has not only gained her admiration in the community but has also brought significant benefits to it. She works tirelessly to create a warm and safe home for her daughter.

5. Ms. Zhang has experienced health complications over the last three months. Although she has largely recovered physically, she continues to experience emotional and mental challenges stemming from this difficult experience.

6. Defense counsel is unaware of any violations of Ms. Zhang's conditions of pretrial release.

7. To the extent that the time restrictions of the Speedy Trial Act apply to Defendant's request, Defendant provides the following:

- a. The indictment in this matter was returned on August 7, 2024. (Doc. 1). Ms. Zhang was arraigned on September 3, 2024. (Doc. 5).
- b. The Defendant's request is excludable time under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A).
- c. The Speedy Trial Act gives a court the discretion to "accommodate limited delays for case-specific needs." *United States v. Zender*, 547 U.S. 489, 499 (2006).
- d. The facts of this case set forth in the unopposed motion justify an ends of justice determination that a continuance of the trial and further proceedings until the completion of a presentence investigation and Presentence Report "outweighs the best interest of the public and the defendant in a speedy trial." *United States v. Toombs*, 547 F.3d 1262, 1273 (10th Cir. 2009), citing 18 U.S.C. §3161(h)(7)(A).
- e. The length of time to complete a presentence investigation, make any objections to that report and complete a sentencing memorandum for a

combined plea and sentencing proceeding would place that proceeding beyond the currently scheduled trial date.

- f. Opposing counsel, Assistant United States Attorney Elizabeth Bagwell, has been contacted regarding this request, and she has no objection.
- g. The relief would have minimal impact on the scheduled trial or other deadlines as Defendant wants to plead guilty.

- 6. Ms. Zhang requests an Order directing the United States Probation Office to prepare a presentence investigation report and to continue her jury trial indefinitely to allow the report to be completed for a combined plea and sentencing proceeding. Ms. Zhang understands her right to a speedy trial and chooses not to exercise her right to a jury trial in this matter.

WHEREFORE, Ms. Zhang respectfully requests the Court to grant her unopposed motion for a combined plea and sentencing hearing.

Respectfully Submitted,

s/Edward Blau
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Attorney for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on the 27th day of May 2025, a true and correct copy of the within and foregoing instrument was delivered by ECF mailing to:

AUSA Elizabeth Bagwell
Western District of Oklahoma

s/Edward Blau
EDWARD M. BLAU, OBA #20626